

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

HATEM MORRAR,)	
)	
Plaintiff,)	
)	
v.)	No. 08 C 151
)	
MICHAEL CHERTOFF, Director, Department)	
of Homeland Security, and ROBERT S.)	Judge Nordberg
MUELLER, Director, Federal Bureau of)	
Investigation,)	
)	
Defendants.)	

**UNITED STATES' MOTION FOR ADDITIONAL
TIME TO FILE MOTION FOR SUMMARY JUDGMENT**

The United States, by Patrick J. Fitzgerald, United States Attorney for the Northern District of Illinois, on behalf of defendants, Michael Chertoff and Robert S. Mueller, III, moves for six days additional time to file its motion for summary judgment. In support, the United States avers:

1. By order of the court, the United States is required to file its motion for summary judgment no later than May 7, 2008.
2. Counsel for the government has been out of the office for an extended period, and he has been unable to complete his motion, memorandum in support, and Local Rule 56.1 statement within the time required by the court.
3. Consequently, the United States needs six days additional time, including in the count the upcoming weekend, or until May 13, 2008, to file its motion for summary judgment and supporting pleadings.

4. This motion is not being made for purposes of unwarranted delay.

5. It is most unlikely that plaintiff will be prejudiced if the court grants the government an additional six days to file its summary judgment motion.

WHEREFORE, for the reasons stated, the United States moves for six additional days in which to file its motion for summary judgment, or until May 13, 2008.

Respectfully submitted,

PATRICK J. FITZGERALD
United States Attorney

By:

s/Pierre C. Talbert
PIERRE C. TALBERT
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 353-4088

Dated: May 7, 2008